

Exhibit “F”



U.S. Department of Justice

Tax Division

Western Criminal Enforcement Section
P.O. Box 972
Washington, D.C. 20044
202-514-5762 (v)
202-514-9623 (f)

November 6, 2020

Mark J. Geragos
Geragos & Geragos APC
Counsel for Lev Aslan Dermen
644 S Figueroa Street
Los Angeles, CA 90017

Re: *United States v. Lev Dermen*, 18-CR-365-JNP: Fifty-third Discovery Production

Dear Counsel:

We are in receipt of the October 27, 2020 email from Ms. Setara Qassim regarding your discovery requests. I note at the outset that much of your request does not fall within the scope of the government's discovery obligations. Nonetheless, in order to avoid unnecessary litigation, we are providing the documents listed below in response to your request, via an online file sharing platform. As always, these records are being provided pursuant to the October 3, 2018 protective order, *see* ECF 67 & 89, as well as the Discovery Clawback Protocol, *see* ECF 102.

1. Five emails with R. Todd Neilson with regard to the Regdalin bankruptcy.
2. Twenty-seven emails with Brendan Morrissey with regard to Mobstar.
3. Letters from Jacob Kingston to Mega Varlik, Akbank, Albaraka Bank, Finans Bank, Garanti Bank, ICBC Turkey Bank, Odea Bank, QNB Finansbank, Sekerbank, Vakiflar Bank, Ekonomi Bank, Yapi ve Kredi Bank, and Ziraat Bank requesting that they provide relevant records to the IRS. My understanding is that only Mega Varlik responded, and its response was provided to you in volume 52 of discovery.
4. One email from Jacob Kingston's counsel, Wally Bugden

In addition, we are providing you with recent productions from WZI Inc and On Track Escrow, as well as with title reports we have received with regard to various properties in the United States, Belize, and Turkey.

We do not have any additional memoranda of Jacob Kingston, Sally Kingston, Rachel Kingston, Isaiah Kingston, or Edgar Sargsyan to provide. In addition, we have not had any contact with Caglar Sendil. Further, we do not see any basis for your blanket request for correspondence with attorneys for defendants, witnesses, or non-witnesses such as Edgar Sargsyan. Finally, with regard to your request for Jacob Kingston's jail call recordings and visitor logs, we have turned over what we received from the jail prior to trial. If you would like more recent recordings or logs and believe you are entitled to them, we would invite you to request them directly from the jail.

Also, please note that Wally Bugden was appointed as Jacob Kingston's counsel under the CJA by Magistrate Judge Wells on October 22, 2020.

Very truly yours,

RICHARD E. ZUCKERMAN
Principal Deputy Assistant Attorney General

/s/ Arthur J. Ewencyk

ARTHUR J. EWENCZYK

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